

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

December 10, 2007

Mr. Roy Spears, Document Manager National Energy Technology Laboratory U.S. Department of Energy 3610 Collins Ferry Road P.O. Box 880 Morgantown, WV 26507-0880

RE: Final Environmental Impact Statement (FEIS) for the Western Greenbrier Co-Production Project. CEQ No 20070472

Dear Mr. Spears:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the above referenced project. The FEIS was prepared to assess the potential impacts that would result from a proposed Department of Energy (DOE) action to provide Federal financial assistance for the construction and demonstration of a 98 megawatt (MWe) net power plant and cement manufacturing facility to be located in the municipality of Rainelle, Greenbrier County, West Virginia. The Western Greenbrier Co-Generation, LLC (WGC) proposes to design, construct, and operate an atmospheric pressure circulating fluidized bed (CFB) power plant that would generate electricity and stream by burning approximately 3,000 to 4,000 tons per day of coal refuse (gob) from several local sites and fuel sources. The facility would be constructed and demonstrated through a cooperative agreement between the Department of Energy (DOE) and WGC under the Clean Coal Power Initiative Program.

On January 17, 2007, EPA provided comments on the Draft Environmental Impact Statement. In the November FEIS the DOE provided responses to those comments. As part of those responses the FEIS includes provisions for the use of ultra low fuels for on and off road diesel vehicles, and the consideration of anti-idling controls as part of the project's mitigation measures. Further, the DOE has made provisions to incorporate points of clarification into the FEIS including but not limited to, water resource use and evaluation, noise, coal refuse pile assessment and remediation plans, the analysis and management of coal ash, air quality, wetland impacts and mitigation associated with the project including impacts from the associated transmission line corridor. As such, EPA has no further concerns with the FEIS.

While not commented on during the Western Greenbrier DEIS, EPA would like to recognize the growing concerns with CO2 emissions from coal fired power plants and Climate Change. Through a number of initiatives, the Federal government, partnerships and programs

continue to investigate opportunities to conserve fossil fuels, improve energy efficiency and sequester carbon as ways to help the U.S. meet its national Climate Change goals. It is EPA's expectation that the DOE Clean Coal Power Initiative will further promote these national goals.

EPA appreciates the opportunity to comment on the project as well as the changes made on the FEIS. If you have any question regarding our comments please call Kevin Magerr at (215) 814-5724.

Sincerely,

William Arguto

NEPA Team Leader

Environmental Programs Branch